

EXHIBIT 24

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ASETEK DANMARK A/S,)
)
 Plaintiff and)
 Counter-Defendant,)
)
 vs.) Case No. 3:19-cv-00410-EMC
)
 COOLIT SYSTEMS, INC.,)
)
 Defendant and)
 Counter-Claimant.)
)
 COOLIT SYSTEMS USA INC.,)
 COOLIT SYSTEMS ASIA PACIFIC)
 LIMITED, COOLIT SYSTEMS)
 (SHENZHEN) CO., LTD.,)
)
 Defendants,)
)
 COSAIR GAMING INC., and)
 CORSAIR MEMORY INC.,)
)
 Defendants.)
 _____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
 DEPOSITION OF DAVID TUCKERMAN, Ph.D.
 MONDAY, DECEMBER 20, 2021

Reported Remotely and Stenographically by:
 JANIS JENNINGS, CSR No. 3942, CLR, CCRR
 Job No. 4997330

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6
7 REMOTE DEPOSITION OF DAVID TUCKERMAN, Ph.D., located
8 in Lake Stevens, Washington, taken on behalf of the
9 Defendants and Counter-Claimants CoolIT entities and
10 Corsair entities, beginning at 9:05 a.m., on Monday,
11 December 20, 2021, sworn remotely by Janis Jennings,
12 Certified Shorthand Reporter No. 3942, CLR, CCRR,
13 located in the City of Walnut Creek, County of
14 Contra Costa, State of California.
15
16
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18
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22
23
24
25

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WITNESS

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DAVID TUCKERMAN, Ph.D.

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10

EXAMINATION BY MS. BHATTACHARYYA

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1 MONDAY, DECEMBER 20, 2021; 9:05 A.M.

2

3 09:05

4 THE VIDEOGRAPHER: Good morning. We are 09:05

5 going on the record at 9:05 a.m. on December 20, 09:05

6 2021. This is media unit 1 of the video recorded 09:05

7 deposition of Dr. David Tuckerman taken by counsel 09:05

8 in the matter of Asetek Danmark A/S versus CoolIT 09:06

9 Systems Incorporated and all related cross actions 09:06

10 filed in the U.S. District Court for the Northern 09:06

11 District of California, case number 09:06

12 3:19-cv-00410-EMC. 09:06

13 This deposition is being held by Veritext 09:06

14 Virtual via Zoom web conferencing. My name is Soseh 09:06

15 Kevorkian from the firm Veritext and I'm the 09:06

16 videographer. Our court reporter is Janis Jennings 09:06

17 also from the firm Veritext. 09:06

18 At this time will counsel and all present 09:06

19 please identify themselves for the record. 09:06

20 MR. CHEN: Absolutely. Arpita, would you 09:06

21 like to start. 09:06

22 MS. BHATTACHARYYA: Sure. Arpita 09:06

23 Bhattacharyya from the Finnegan Law Firm here with 09:06

24 Dr. David Tuckerman. 09:07

25 MR. CHEN: And this is Reuben Chen from -- 09:07

1 MS. BHATTACHARYYA: And -- and -- sorry. Go 09:07
2 ahead, Rueben. I wanted to add that I'm here on 09:07
3 behalf of the plaintiff Asetek Danmark A/S. 09:07

4 MR. CHEN: Thank you. This is Rueben Chen 09:07
5 from Cooley LLP on behalf of CoolIT as well as 09:07
6 Corsair, and with me is my colleague Dustin Knight. 09:07

7 THE VIDEOGRAPHER: Thank you. 09:07

8 And I just have a quick question for the 09:07
9 witness. Your screen went dark during the read-on. 09:07
10 Is there any way to brighten it a little bit or? 09:07

11 THE WITNESS: You know, I don't know why 09:07
12 it's doing that. Let me see if I can kill lights 09:07
13 behind me because it may be the -- the 09:07
14 auto-contrast. I wish -- I wish there was a way to 09:07
15 manually adjust contrast. Oh, this is much better. 09:07

16 THE VIDEOGRAPHER: Okay. Great. Thank you. 09:07
17 Yeah, that's better. Thanks. 09:07

18 Janis, whenever you're ready. 09:07

19

20 DAVID TUCKERMAN, Ph.D.,
21 the witness herein, was sworn and
22 testified as follows:

23 09:08

24 DEPOSITION REPORTER: Thank you. 09:08

25 Please begin, Counsel. 09:08

1 MR. CHEN: Thank you, Miss Reporter. 09:08
2
3 EXAMINATION 09:08
4 BY MR. CHEN: 09:08
5 Q. Good morning, Dr. Tuckerman. How are you? 09:08
6 A. Fine, thank you. 09:08
7 Q. Great. Can you please state your full name 09:08
8 for the record. 09:08
9 A. David Bazeley Tuckerman. Middle initials -- 09:08
10 middle name is spelled B-a-z-e-l-e-y. 09:08
11 Q. Great. Thank you. 09:08
12 A. Last name as it sounds, T-u-c-k-e-r-m-a-n. 09:08
13 Q. Thank you. And can you please provide your 09:08
14 home address, please. 09:08
15 A. 12724 128th Avenue Northeast, Lake Stevens, 09:08
16 S-t-e-v-e-n-s, Washington State 98258. 09:09
17 Q. Okay. Thank you. And, Dr. Tuckerman, have 09:09
18 you had your deposition taken before? 09:09
19 A. A long time ago. 09:09
20 Q. Okay. And how many times have you been 09:09
21 involved in a deposition? 09:09
22 A. Three prior times. 09:09
23 Q. Three prior times. 09:09
24 And were those three prior times all with 09:09
25 respect to a patent case? 09:09

1 Let me introduce into the record Exhibit No. 13:25
2 267, which is Bates number ASE-CLT00045006 -- 13:26
3 THE WITNESS: Okay.
4 MR. CHEN: -- to 45014. 13:26
5 (Exhibit 267 marked for identification.) 13:26
6 BY MR. CHEN: 13:26
7 Q. And you cite to this document in paragraph 13:26
8 55 of your report; correct? 13:26
9 A. Okay. 13:26
10 Q. Correct? 13:26
11 A. ACT -- 45006, yes, I did. Oh, wait a 13:26
12 minute, this is 45 -- oh, I see, the pages are 13:27
13 sequential. Yes. Yes. 13:27
14 Q. Okay. 13:27
15 A. Yes.
16 Q. All right. What is the publication date of 13:27
17 this document? 13:27
18 A. Version 4.0 says April 6, 2004. 13:27
19 Q. And is this version 4.0 or 4.1? 13:27
20 A. Well, I guess it would be version 4.1. 13:27
21 Q. Okay. And what's the publication date for 13:27
22 version 4.1? 13:27
23 A. That's October 18, 2004. 13:27
24 Q. Okay. And can you please go to Figure 2 -- 13:27
25 A. Okay. 13:27

1 Q. -- of the user manual, which is on Bates 13:27
2 No. ASE-CLT00045008. 13:28
3 A. Yeah. 13:28
4 Q. Which part would you describe as the fluid 13:28
5 heat exchanger in Figure 2? 13:28
6 A. Well, it's a -- an integrated unit. You 13:28
7 know, I mean, it's -- it collectively functions as 13:28
8 a -- as a fluid heat exchanger. 13:28
9 Q. So what --
10 A. You have to put all the parts together. 13:28
11 Q. Okay. So it's not -- it's not No. 1? 13:28
12 A. I would say you'd have to assemble it for it 13:28
13 to be -- function as a fluid heat exchanger. 13:29
14 Q. Okay. So there are multiple versions of 13:29
15 user manuals for Antarctica; correct? 13:29
16 A. I don't know that. I only know that this 13:29
17 document shows that there was a version 4.0 and a 13:29
18 4.1. That's all I know. 13:29
19 Q. Okay. So you wouldn't know how many 13:29
20 versions of user manuals there are; correct? 13:29
21 A. No, I have no idea. 13:29
22 Q. Okay. Could you please go to paragraph 54 13:29
23 in your report. And at paragraph 54, you state: 13:29
24 "Asetek invented and sold the 13:30
25 Antarctica WaterChill CPU cooler in 13:30

1 the U.S. in 2004, prior to the 13:30
2 August 9, 2007 priority date of the 13:30
3 '330 patent." 13:30
4 Correct? 13:30
5 A. That's what it says, yes. 13:30
6 Q. Okay. And what did you rely on for your 13:30
7 understanding that the specific Antarctica device 13:30
8 that you inspected in Palo Alto was publicly 13:30
9 available before August of 2007? 13:30
10 A. What I was shown was that they -- documents 13:30
11 showing that Antarctica was sold around 2004. 13:30
12 The -- I mean, clearly the object I was shown was 13:30
13 not sold because they still had it, so I couldn't 13:31
14 comment on -- on that. 13:31
15 Q. Do you know for a fact if the specific model 13:31
16 that you inspected was, in fact, sold prior to 13:31
17 August 9, 2007? 13:31
18 MS. BHATTACHARYYA: Objection. Calls for a 13:31
19 legal conclusion. 13:31
20 THE WITNESS: I can't say that I know that 13:31
21 for certain. That would have to be a question for 13:31
22 Asetek, I guess. 13:31
23 MR. CHEN: Okay. I'd like to introduce 13:31
24 Exhibit 268 into the record. Exhibit 268 is a 13:31
25 document bearing Bates No. ASE-CLT00044691 to 44701. 13:32

1 (Exhibit 268 marked for identification.) 13:32

2 BY MR. CHEN: 13:32

3 Q. Dr. Tuckerman, have you ever seen this 13:32

4 document before? 13:32

5 A. It does not look familiar. 13:32

6 Q. Okay. I don't think you relied on it in 13:32

7 your report. 13:33

8 A. Right. And I wouldn't have seen it. If it 13:33

9 was at all relevant, we would -- I would have 13:33

10 included it, you know. 13:33

11 Q. So I'm going to go ahead and point you to a 13:33

12 sentence that's on ASE-CLT00044694. And it's the 13:33

13 first sentence that reads: 13:33

14 "The CPU blocks are where the 13:33

15 WaterChill Antarctica kits really vary 13:33

16 from the first generation water blocks." 13:33

17 [As read.]

18 Do you see that? 13:33

19 A. Yes. 13:33

20 Q. Were there multiple generations of 13:33

21 WaterChill Antarctica? 13:33

22 A. I don't know. 13:33

23 MR. CHEN: I'd like to introduce 13:33

24 Exhibit 269, which is Bates numbered ASE-CLT00044702 13:33

25 to 44726. 13:34

1 (Exhibit 269 marked for identification.) 13:34

2 BY MR. CHEN: 13:34

3 Q. And I'd like to point -- have you seen this 13:34

4 document before, Dr. Tuckerman? 13:34

5 A. I don't believe -- I don't believe so. 13:34

6 Q. Okay. And could I direct your attention to 13:34

7 the page Bates numbered ASE-CLT00044702. 13:34

8 A. Oh, 702. Okay. It's up near the front. 13:35

9 All right. 13:35

10 Q. And are you there? 13:35

11 A. I am there. 13:35

12 Q. Okay. Thank you. 13:35

13 Do you see the second to last paragraph that 13:35

14 reads: 13:35

15 "The kit we received from Asetek is 13:35

16 pretty much their best kit. It's 13:35

17 called the K12AT-L30/220V/Dual 13:35

18 Radiator Socket LGA755 kit, a 13:35

19 CPU/VGA/Chipset kit. We opted the 13:35

20 version with the thick 1/2" tubing 13:35

21 for optimal flow. Next to that the 13:35

22 kit has the heavy Hydor L30-II 13:36

23 included, a pump that can push 13:36

24 1200 liters of water per hour." 13:36

25 Do you see that? 13:36

1 all-in-one is a bit vague here. In this case I 13:39
2 would use the language that they described it. It 13:39
3 contains all these components. 13:39
4 BY MR. CHEN: 13:39
5 Q. And there were others besides Asetek that 13:39
6 prior to Asetek's invention sold all-in-one with the 13:39
7 coolers; correct? 13:39
8 MS. BHATTACHARYYA: Objection. Outside the 13:39
9 scope of the report. 13:39
10 THE WITNESS: Yeah. That's not a question I 13:39
11 researched. 13:39
12 MR. CHEN: Okay. All right. No problem. 13:39
13 Let me introduce the next exhibit, which is 13:39
14 Exhibit 270, and that is Bates numbered 13:39
15 ASE-CLT00044729 to 44731. 13:39
16 (Exhibit 270 marked for identification.) 13:40
17 BY MR. CHEN: 13:40
18 Q. Do you see that? 13:40
19 A. I do. 13:40
20 Q. Okay. And have you ever seen this document 13:40
21 before? 13:40
22 A. I don't believe so. 13:40
23 Q. Okay. Let me direct your attention back to 13:40
24 the user manual, which is Exhibit 267. 13:40
25 You rely on this user manual for your 13:40

1 report; correct? 13:40

2 A. Yeah. I mean, I cite it. 13:40

3 Q. Right. Okay. Not a trick question. All 13:41

4 right. 13:41

5 Would a person of ordinary skill in the art 13:41

6 looking at the user manual consider that the device 13:41

7 that's shown in the user manual to be the same 13:41

8 device that you inspected in Palo Alto? 13:41

9 A. Well, it -- it differs in one respect for 13:41

10 sure, and that is that the -- the location of the 13:41

11 ports don't appear to be the same. And so I don't 13:41

12 know if it's intended to be a schematic, you know, 13:42

13 wherein the Y connection is implied. Let's see, 13:42

14 well, I mean, I guess it has to be. Yeah. 13:42

15 So it's a -- it has to be that the outlet 13:42

16 shown there is -- is the output of the Y and they're 13:42

17 just not, you know, showing that detail because it's 13:42

18 kind of a vertical view. Yeah. 13:42

19 Q. Okay. Do the Antarctica pictures and 13:42

20 discussions in the user manual disclose each and 13:42

21 every element of the asserted claims of the '330 13:42

22 patent? 13:42

23 MS. BHATTACHARYYA: Objection. Calls for a 13:42

24 legal conclusion. 13:42

25 THE WITNESS: Well, what I -- I don't think 13:43

1 that's what I said. I mean, I -- what I said was 13:43
2 that I viewed those claims as obvious in view of 13:43
3 Antarctica. 13:43
4 BY MR. CHEN: 13:43
5 Q. Right. Right. Right. And that -- well, 13:43
6 that's my question to you. Let me rephrase, then. 13:43
7 Do the Antarctica pictures and discussions 13:43
8 in the user manual render obvious each and every 13:43
9 element of the asserted claims of the '330 patent? 13:43
10 MS. BHATTACHARYYA: Objection. Calls for a 13:44
11 legal conclusion. Mischaracterizes the record. 13:44
12 THE WITNESS: Just a moment. I mean... Let 13:44
13 me just refresh my memory on what I said. So can we 13:44
14 go to the claim -- the relevant claim chart? 13:45
15 BY MR. CHEN: 13:45
16 Q. Yeah. Actually, let's go to the patent -- 13:45
17 let's go to --
18 A. Well, I'd like to go to the claim chart to 13:45
19 answer this question. 13:45
20 Q. You're welcome to. You're welcome to. I'm 13:45
21 just trying to search -- you're welcome. You've got 13:45
22 the whole report in front of you, so I'm trying to 13:45
23 short-circuit it. You also have Exhibit 263 which 13:45
24 is the '330 patent as well. 13:45
25 A. Yeah. Okay. Let me just make sure I got

1 based on not seeing the device. 13:47

2 BY MR. CHEN: 13:47

3 Q. Are you aware that Asetek has produced 13:47

4 videos of Antarctica in this case? 13:47

5 A. I was not aware of that. 13:47

6 Q. Okay. So you haven't seen those videos; 13:47

7 correct? 13:47

8 A. That is correct. 13:47

9 Q. Let's turn to paragraph 57 of your report. 13:47

10 Why don't you go ahead and read that paragraph and 13:47

11 let me know when you're finished. 13:47

12 A. Okay. All right. 13:48

13 Q. Okay. You've had a chance to review 13:48

14 paragraph 57; correct? 13:48

15 A. Yeah, I have. 13:49

16 Q. Okay. And you state in paragraph 57 that 13:49

17 the space between adjacent fins is about 0.9 to 1 13:49

18 millimeter; correct? 13:49

19 A. Yes. 13:49

20 Q. What evidence do you point to in your report 13:49

21 for this opinion? 13:49

22 A. Well, okay. So first there is Eriksen's 13:49

23 deposition; however, I didn't think that was 13:49

24 sufficient to be something I was going to swear to, 13:49

25 so I wanted to inspect the device personally. And I 13:49

1 used like -- I used calipers to measure the fins at 13:49
2 the base which is where I felt the most relevant 13:49
3 dimension was because the base of the fins is where 13:49
4 the most heat transfer occurs. 13:49

5 As fins -- you go up in fin height, they 13:50
6 become less effective. And so to me, the base was 13:50
7 the relevant dimension to measure it at. And I got 13:50
8 readings, you know, between 9.9 and 1.0, so I was 13:50
9 okay with that. 13:50

10 Q. Did you make those measurements prior to 13:50
11 submitting your report or after you submitted your 13:50
12 report? 13:50

13 A. I made them prior. 13:50

14 Q. Okay. Did you record those measurements 13:50
15 anywhere? 13:50

16 A. I did not, no. 13:50

17 Q. And you don't include any evidence of those 13:50
18 measurements in your report; correct? 13:50

19 A. No. I felt that the readings were close 13:50
20 enough that I didn't need to -- that combined with 13:50
21 the -- you know, Eriksen's testimony and my own 13:50
22 measurements. I did -- I will say that after I saw 13:51
23 the rebuttal report from Dr. Pokharna, I got 13:51
24 concerned. He measured the fins at the top; I had 13:51
25 measured them at the bottom. 13:51

1 I would say that when you -- the 13:51
2 measurement -- first of all, I would have expected 13:51
3 fins to be larger at the top, that is an inherent -- 13:51
4 channel widths to be larger at the top. That's an 13:51
5 inherent feature of machining. And the technique 13:51
6 that Dr. Pokharna used to measure is subject to 13:51
7 error if you, you know, apply excessive force to 13:51
8 the -- you know, to it because the copper is very, 13:51
9 very soft. And so the slightest little bit of force 13:51
10 will put an indentation in the copper and give you a 13:51
11 high reading. 13:52

12 But, you know, I had the additional concern 13:52
13 that, you know, was there any further corroboration, 13:52
14 you know, besides my own measurements at the base. 13:52
15 And counsel provided me a picture of the machining 13:52
16 document for the Antarctica device, and it showed 13:52
17 them with -- it showed the blades that they say they 13:52
18 used with calipers measuring that blade. 13:52

19 And they to got -- it was 0.93 millimeters 13:52
20 on the -- on the blade, because these were solid 13:52
21 grooves. And so -- and then the box on the -- that 13:52
22 was next to it that the blades was identified with a 13:52
23 legend that led me to believe that it was a blade 13:53
24 that was intended to give you a nominal 1-millimeter 13:53
25 cut. 13:53

1 And that made sense to me because you always 13:53
2 get a cut that's wider than your blade. And so a 13:53
3 blade that is nominally designed to cut metal at 1 13:53
4 millimeter might well be 0.93 millimeters wide. So, 13:53
5 you know, I, you know, concluded that, okay, it was 13:53
6 designed for nominally 1 millimeter and I got 13:53
7 measurements at the base 0.91. Dr. Pokharna got 13:53
8 higher measurements, I know that. 13:53

9 But, you know, I did say the space between 13:53
10 the adjacent pins is about a 0.9 to 1.0. I didn't 13:53
11 say precisely. I didn't take it out to the next 13:54
12 decimal digit. So that's all the information I have 13:54
13 on the microchannel spacing. 13:54

14 Q. But none of the information that you're 13:54
15 referring to is actually cited and included in your 13:54
16 report; correct? Other than Dr. -- excuse me, 13:54
17 Mr. Eriksen's deposition testimony? 13:54

18 A. Well, that's right. Because I didn't -- at 13:54
19 the time I thought that was good enough. You know, 13:54
20 I had his -- Eriksen's information and I had my own 13:54
21 measurements at the base, and I didn't think there 13:54
22 was going to be a dispute on the issue, so I didn't 13:54
23 pursue it further. 13:54

24 Q. Did you see that Mr. Eriksen in his 13:54
25 deposition said that 0.6 to 0.8 was his best guess? 13:54

1 A. Well, yeah, I did see that. 13:54

2 Q. Uh-huh. Did you speak with Mr. Eriksen 13:54

3 before you signed your expert report? 13:54

4 A. No. I had never spoken with Mr. Eriksen. 13:54

5 Q. Okay. 13:54

6 A. As I said, I wasn't relying on -- I wouldn't 13:54

7 have signed a report relying just on his say so. 13:55

8 That's why I measured them myself. And in point of 13:55

9 fact, they were larger than -- than his 13:55

10 recollection. 13:55

11 Q. And to your knowledge, did Mr. Eriksen 13:55

12 measure Antarctica's channel widths? 13:55

13 A. I don't know what he did. Like I said, I've 13:55

14 never had contact with him. 13:55

15 Q. Okay. 13:55

16 A. And I'll also mention I don't know that the 13:55

17 device I got is representative. I mean, you know, 13:55

18 there is manufacturing variations. So, you know, 13:55

19 this is one sample. Why did they have the sample; 13:55

20 maybe it was a reject they happened to have lying 13:55

21 around out of spec. I just don't know. You know, I 13:55

22 only know what I measured. 13:55

23 Q. Right. There is no way for you to say with 13:55

24 certainty that the channel widths of the Antarctica 13:56

25 device that was on sale prior to August 9, 2007 was 13:56

1 1 millimeter or less; correct? 13:56

2 MS. BHATTACHARYYA: Objection. Calls for a 13:56

3 legal conclusion. Mischaracterizes the record. 13:56

4 Mischaracterizes prior testimony. 13:56

5 THE WITNESS: Yeah. I would have no way of 13:56

6 knowing that. I was given a device that I 13:56

7 understood to be representative, and, you know, I 13:56

8 measured it. 13:56

9 BY MR. CHEN: 13:56

10 Q. Right. Okay. In your report you state 13:56

11 that: 13:56

12 "A person of ordinary skill in the art 13:56

13 would have known that the fins in a 13:56

14 fluid heat exchanger should be disposed 13:57

15 in such a way that they would form 13:57

16 microchannels between adjacent fins." 13:57

17 Correct?

18 (Clarification requested by Reporter.)

19 MR. CHEN: "...between adjacent fins."

20 DEPOSITION REPORTER: Thank you.

21 THE WITNESS: Well, sure. I mean, like I 13:57

22 say, microchannels had been known at that time for 13:57

23 26 years and their benefits were well understood by 13:57

24 then. 13:57

25 / / /

1 BY MR. CHEN: 13:57

2 Q. And you also state in your report that: 13:57

3 "This is because microchannels have 13:57

4 large surface area to volume ratios 13:57

5 and provide a large heat transfer 13:57

6 surface area per unit fluid flow 13:57

7 volume as compared to macro channels 13:57

8 or mini channels." 13:57

9 Is that right? 13:57

10 A. Yeah. I mean, it is correct. There's 13:57

11 additional benefits that -- 13:58

12 Q. No, no, I'm asking about your report. 13:58

13 A. Yeah, that's what my report says, yeah. 13:58

14 Q. Okay. And in your report, is that the only 13:58

15 opinion you're -- you offer for why a person of 13:58

16 ordinary skill in the art would have implemented 13:58

17 microchannels? 13:58

18 A. So in my Ph.D. thesis for sure I discussed 13:58

19 the higher heat transfer coefficient that you get. 13:58

20 I can't recall whether that is specifically 13:58

21 discussed in the report. I -- it -- because it's a 13:58

22 subtler point. But there is -- there is this 13:58

23 twofold effect that it's getting more surface area 13:59

24 and it's getting -- the narrower channels have 13:59

25 higher heat transfer coefficients, and both are -- 13:59

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6 I, DAVID TUCKERMAN, Ph.D., do hereby declare
7 under penalty of perjury that I have read the foregoing
8 transcript; that I have made corrections as appear
9 noted, in ink, initialed by me, or attached hereto; that
10 my testimony as contained herein, as corrected, is true
11 and correct.

12 EXECUTED this ____ day of _____,
13 2022, at _____, - _____.
14 (City) (State)

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18 DAVID TUCKERMAN
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1 I, JANIS JENNINGS, CSR No. 3942, Certified
2 Shorthand Reporter, certify:

3 That the foregoing proceedings were taken
4 before me at the time and place therein set forth, at
5 which time the witness was duly sworn by me;

6 That the testimony of the witness, the
7 questions propounded, and all objections and statements
8 made at the time of the examination were recorded
9 stenographically by me and were thereafter transcribed;

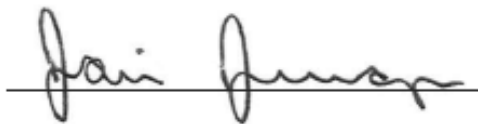
10 That the foregoing pages contain a full, true
11 and accurate record of all proceedings and testimony.

12 Pursuant to F.R.C.P. 30(e)(2) before
13 completion of the proceedings, review of the transcript
14 [X] was [] was not requested.

15 I further certify that I am not a relative or
16 employee of any attorney of the parties, nor financially
17 interested in the action.

18 I declare under penalty of perjury under the
19 laws of California that the foregoing is true and
20 correct.

21 Dated this 4th day of January, 2022.

22 
23

24 JANIS JENNINGS, CSR NO. 3942

25 CLR, CCRR